

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**SUNTRUST MORTGAGE, INC.,
a Virginia Corporation**

Plaintiff.

v.

CIVIL ACTION NO. 3:11cv565-MHL

**LCMG, INC., d/b/a MORTGAGE MAKERS,
a South Carolina Corporation**

Defendant.

**DEFENDANT'S MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO PLAINTIFF'S DISCOVERY**

COMES NOW the Defendant, by counsel, pursuant to Fed. R. Civ. P. 6(b)(2)(B), and moves the Court for an Enlargement of Time within which to respond to the discovery propounded by Plaintiff previously due on January 30, 2012, to now be due February 23, 2012, with objections due on February 16, 2012.

Counsel for the Plaintiff agreed to a two-week extension of the time to answer the discovery but did not agree to extend the deadline for objections. Thus, the Defendant moves the court for an order enlarging both the time to object and to serve responses.

Respectfully Submitted,

LCMG, INC., d/b/a
MORTGAGE MAKERS

/s/

Susan M. Rotkis, VSB # 40693
Leonard A. Bennett, VSB #37523
Attorney for Defendant
CONSUMER LITIGATION
ASSOCIATES, P.C.
763 J. Clyde Morris Blvd. Suite 1A

Newport News, VA 23601
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
lenbennett@cox.net
srotkis@clalegal.com

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of February, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Robert Dean Perrow
Williams Mullen
200 South 10th Street
16th Floor
Richmond, VA 23219
E-mail: bperrow@williamsmullen.com

John Peyton McGuire Boyd, Jr.
William Mullen
200 South 10th Street
16th Floor
Richmond, VA 23219
E-mail: mboyd@williamsmullen.com

Steven Patrick Gould
Williams Mullen
200 South 10th Street
16th Floor
Richmond, VA 23219
E-mail: sgould@williamsmullen.com

/s/

Susan M. Rotkis, VSB #40693
Leonard A. Bennett, VSB #37523
Attorney for Plaintiff
CONSUMER LITIGATION
ASSOCIATES, P.C.
763 J. Clyde Morris Blvd., Suite 1A
Newport News, VA 23601